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January 25, 2017

VIA ECF

Honorable Steven I. Locke
United States Magistrate Judge
United States Courthouse
944 Federal Plaza
Central Islip, NY 11722

Re: *Aaron Cohen v. Ditech Financial LLC, et al.*
Case No.: 2:15-CV-6828 (Eastern District of New York)

Dear Judge Locke:

Pursuant to Section 2 of Your Honor's Individual Practices, Ditech Financial, LLC ("Ditech") and Rosicki Rosicki & Associates P.C. ("Rosicki"), jointly write to request a sixty (60) day adjournment of the February 10, 2017 summary judgment motion deadline to April 11, 2017.

There are two dispositive motions to dismiss (the "Motions") filed by both Rosicki and Ditech pending before the Court. The Motions are fully briefed and have been pending since May 20, 2016 [ECF 24-33]. Rosicki and Ditech believe that the adjournment of the February deadline is appropriate as the decision on the Motions could potentially eliminate the need for summary judgment motions or significantly narrow the subject matter of the issues to be briefed in the motions.

This is the parties' third request for adjournment of the dispositive motion deadline. However, the parties would state that this request is made in good faith and not for the purposes of delay. **It should be noted that Plaintiff Aaron Cohen ("Cohen") did not agree or stipulate to this request.** We thank you again for your continued consideration of this matter.

Respectfully submitted,

/s/ Adam Hartley
Adam Hartley
Counsel for Ditech

/s/ Carol Lastorino
Carol Lastorino, Esq.
Counsel for Rosicki

cc: *Shimshon Wexler, Esq.*